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<u>e-filed</u>

Hon. Michael B. Kaplan, USBJ
Trenton, New Jersey

> Re: Motion returnable May 19, 2020; 9:00 AM
>   Luz Adriana Alvarez
>   Case No.: 17-19450 (MBK)
>   **Opposition to Motion for Relief from Stay**

Dear Judge Kaplan:

Please accept this letter in lieu of a more formal response to the motion for relief from stay filed by Andrew M. Lubin, Esq., Milstead & Associates LLC on behalf of Select Portfolio Servicing as servicing agent for MEB Loan Trust IV. I requested my adversary's consent to this adjournment today and have not heard as to their position. I send this opposition as protective of my client's rights in the event an adjournment is denied.

Ms. Alvarez states that she was unaware that she needed to make post-petition mortgage payments as to this second mortgage. I recall neither an objection to confirmation being made on behalf of this creditor or their predecessor in interest as to that failure, nor any other communication to indicate that the payments were delinquent until the filing of this motion.

The debtor has made all required Trustee payments and has paid the first mortgage faithfully. I have reviewed the payment history personally.

The debtor intends to file a restated Plan to increase the payments as needed to cure this default. The Plan was confirmed because her sons live with her and were willing to provide the Court with certifications of support. They are willing to increase their support in the amount needed to enable this default to be cured.

Separately, I am now semi-retired. This is quite recent. I became semi-retired in February. I am referring this matter to another attorney and I ask that the new attorney be given a month to prepare and file the needed documents to effectuate the debtor's intentions.

Very truly yours,

Arthur L Skaar Jr

Arthur L. Skaar, Jr., Esq.

ALS/
cc: Client
cc: Andrew M. Lubin, Esq. (via fax)